Remarks/Arguments

In an Office Action dated June 30, 2004 claims 1 – 5 and 15 were allowed, and claims 6 – 14 and 16 – 18 were rejected under § 103 over Banthia in view of Gong. Applicants respectfully traverse the rejections.

Opening Remarks

Applicants thank the Examiner for allowing claims 1 – 5 and 15.

Claims 6 – 10, 12 – 14 and 16 - 18

Claims 6 – 10, 12 – 14 and 16 – 18 were rejected under § 103 over Banthia in view of Gong. Applicants respectfully traverse the rejections.

Claim 6

Applicants respectfully traverse the rejection of claim 6. Claim 6 clearly requires a plurality of unsigned device applets, each from a different device server in a network device. Further, claim 6 requires device applets capable of receiving device information _directly_ from its respective device server.

Applicants first submit that the combination of Banthia with Gong is made only using improper hindsight. Banthia has only a single device server. Banthia does have a series of display applets, but they never communicate with the server. _See_ Banthia, col. 3, ll. 51-56, where the display applets are stated as being passive and having no connection to the server. Therefore there is no suggestion in Banthia of the need to contact multiple servers. Gong may contact multiple servers, but only using its relay server techniques. With Banthia dealing with only one server, there would be no reason to look to Gong to handle multiple servers. Only improper hindsight would lead to the combination.

Applicants second submit that even if Gong were properly combined (and that is clearly not admitted), the combination would still fail to show "each device applet being capable of receiving device information _directly_ from its respective device server." (emphasis added). Gong teaches that a relay server is required. Applicants submit that inclusion of a relay server cannot be characterized as "receiving device information

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directly." Device server to relay server to applet, as shown in Gong, is clearly not device server to applet as required in Claim 6. If the relay server is considered the respective device server, then the combination fails because there is only one relay server, not the plurality required in the claim.

Applicants therefore respectively submit that the rejection is improper due to an improper combination and, even then, missing elements. Applicants thus submit that claim 6 and those dependent therefrom are allowable.

Claim 12

Applicants respectively traverse the rejection of claim 12.

Applicants first note that claim 12 is a method claim, not an apparatus claim as stated in the Office Action.

The Office Action indicates Banthia, col. 4, ll. 1-5 as showing obtaining a reference as required in claim 12. Applicants traverse this indication. Reviewing Banthia col. 3, l. 65 to col. 4, l. 6, this section only relates to transferring of general data, not obtaining references to other applets which may be present. Applicants refer to p. 13, paragraphs 47 to p. 14, paragraph 51 of the present application with regard to claim 12. From this it is clear that the mere data transfer of Banthia is not obtaining references to the applets as required in claim 12. This is clearer when it is understood that the applets of claim 12 are all unsigned applets launched from different devices, which is not the case in Banthia where everything is launched by the single server in Banthia.

The Office Action then merely states that a model adapter object is present, pointing to Banthia col. 3, l. 37 – 44. Applicants submit that this mention in Banthia does not meet the requirement of obtaining a reference to that model adapter object.

The final element in claim 12 requires providing access to a graphical user interface object to the model adapter object using the reference to the model adapter object determined above. The Office Action fails to even mention this element, thus clearly indicating it is not present, and thus is allowable. Further, Banthia teaches nothing similar, at least because it does not even mention the various objects.

Applicants therefore submit that claim 12 is allowable.

Claim 13

Applicants traverse the rejection of claim 13. Again it is noted that the claim is a method claim.

Applicants submit that the mere mention in Banthia of the structured data in Banthia col. 4, ll. 2 – 6 does not indicate that it is represented as a graphical user interface object. Then, the reference to breaking the structured data into individual parts does not indicate that the information is in a form for a model object of a non-graphical user interface class, particularly given that Banthia does not mention whether the display applets are graphical or non-graphical. Finally, the citation to Banthia does not indicate the unpacked device information is added to the model object.

The claims require very specific operations with very specific elements. Banthia is much more general and does not teach or suggest the specific operations or specific elements. The rejection is improper because the specific claim operations and elements are not shown. Mere allegations to general items are not a sufficient showing to form a proper rejection.

Applicants therefore submit that claims 13 is allowable.

Claim 14

Applicants respectfully traverse the rejection of claim 14. Applicants submit that the remarks of claim 6 apply equally to method claim 14 and therefore the claim is allowable.

Claim 16 – 18

Applicants respectfully traverse the rejection of claims 16 – 128. Noting that these claims are article of manufacture claims similar to claims 12 – 14, and these arguments apply equally, Applicants submit that the claims are allowable.

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CONCLUSION

Based on the above remarks Applicants respectfully submit that all of the present claims are allowable. Reconsideration is respectfully requested.
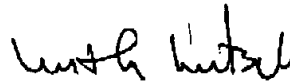
Respectfully submitted,

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CERTIFICATE OF FACSIMILE TRANSMISSION

I hereby certify that this document is being sent by facsimile transmission to Commissioner of Patents for Examiner Lechi Truong (Fax No. 703-872-9306) on November ____, 2004.

Keith Lutsch